

1 KAEMPFER CROWELL
2 Robert McCoy, No. 9121
3 Sihomara L. Graves, No. 13239
4 1980 Festival Plaza Drive, Suite 650
5 Las Vegas, Nevada 89135
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
Email: rmccoy@kcnvlaw.com
Email: sgraves@kcnvlaw.com

6 Attorneys for Defendants American
Express National Bank

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

10 | MA OLIVIA ABAD,

Case No. 2:25-cv-00090-CDS-NJK

11 Plaintiff

**Order Approving
STIPULATION TO
VACATE DEFAULT**

12 | VS.

13 EQUIFAX INFORMATION SERVICES
14 LLC; EXPERIAN INFORMATION
15 SOLUTIONS, INC.; JPMORGAN
16 CHASE BANK, N.A.; CITIBANK,
17 N.A.; SYNCHRONY FINANCIAL;
CAPITAL ONE BANK, NATIONAL
ASSOCIATION; BANK OF AMERICA
CORPORATION; AMERICAN
EXPRESS, INC.; and DISCOVERY
BANK,

[ECF No. 57]

Defendants

Plaintiff Ma Olivia Abad and American Express National Bank,
erroneously sued as American Express, Inc. (“American Express”), stipulate to
following:

23 1. That the Clerk's entry of default of American Express (ECF
24 No. 54) be set aside;

1 2. That plaintiff's motion for entry of default as to American
 2 Express (ECF No. 52) be withdrawn; and

3 3. That American Express be given 30 days from entry of the
 4 order on this stipulation to respond to the complaint (ECF No. 1).

5 The parties make this stipulate to avoid the time and expense of
 6 litigating a dispute over whether American Express was properly served in this
 7 action. The parties agree that Fed. R. Civ. P. 1's goal of a "just, speedy, and
 8 inexpensive determination of every action and proceeding" is best met by
 9 permitting American Express to appear and respond on the merits.

10 FREEDOM LAW FIRM, LLC

11 _____
 /s/ Gerardo Avalos

12 George Haines, No. 9411
 13 Gerardo Avalos, No. 15171
 14 8985 S. Eastern Avenue, Suite 100
 15 Las Vegas, Nevada 89123

16 Attorneys for Plaintiff
 17 Ma Olivia Abad

KAEMPFER CROWELL


 18 _____
 Robert McCoy, No. 9121
 Sihomara L. Graves, No. 13239
 19 1980 Festival Plaza Drive, Suite 650
 20 Las Vegas, Nevada 89135

21 Attorneys for Defendants American
 22 Express National Bank

17 **ORDER**

18 IT IS SO ORDERED.

19 _____
 UNITED STATES DISTRICT JUDGE

20 _____
 DATED: July 15, 2025